

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MARILYN GAYE PIETY FOLEY,

Plaintiff,

v.

DREXEL UNIVERSITY,

Defendant.

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No. 2:22-cv-01777-WB

JOINT STIPULATIONS

1. Plaintiff was first hired at Drexel in 1998 as a Visiting Assistant Professor of Philosophy.
2. In 2001, Plaintiff was promoted to Drexel's tenure-track as Assistant Professor of Philosophy.
3. In 2007, Drexel awarded Plaintiff tenure and promoted her to Associate Professor of Philosophy.
4. In 2016, Drexel promoted Plaintiff to full Professor of Philosophy and was at that time the only full Professor of Philosophy at Drexel.
5. Plaintiff is currently a Professor of Philosophy at Drexel University, in the Department of English and Philosophy ("the Department").
6. Drexel is a private research university in Philadelphia with around 22,000 students.
7. Since September 2017, Dr. Roger Kurtz, has been the Department Head for the Department of English and Philosophy at Drexel.
8. Dr. Kurtz is a full Professor of English and a tenured faculty member at Drexel.
9. Dr. Kurtz conducts all of the annual performance reviews of tenure-line faculty in the Department.
10. The reviews are called Faculty Annual Reviews (FAR).
11. All tenure-line faculty in the Department are reviewed by Department Head Kurtz using the same FAR form. The categories the professors are rated in are: (1) Service; (2) Instruction (Teaching); (3) Research, Scholarship, Creative Activity; and (4) Overall.

12. The scale is from 1 (unsatisfactory) to 5 (outstanding).
13. All of the scores on the Faculty Annual Reviews of Dr. Piety given by Dr. Kurtz, covering Dr. Piety's work from 2016 through 2023 (date of last FAR) have been scores of 3 out of 5 or above. Only two scores were below 4.
14. The scores on the 2016-2017 FAR are: Service, 4 out of 5; Instruction (Teaching), 3 out of 5; Research, Scholarship, Creative Activity, 4 out of 5: and Overall, 3.5 out of 5.
15. The scores on the 2017-2018 FAR are: Service, 4.5 out of 5; Instruction (Teaching), 4 out of 5; Research, Scholarship, Creative Activity, 3.7 out of 5: and Overall, 4 out of 5.
16. The scores on the 2018-2019 FAR are: Service, 4 out of 5; Instruction (Teaching), 4 out of 5; Research, Scholarship, Creative Activity, 4 out of 5: and Overall, 4 out of 5.
17. Dr. Kurtz put no numerical scores on any of the 2019-2020 FAR forms in the Department.
18. Dr. Kurtz put no numerical scores on any of the 2020-2021 forms in the Department.
19. Dr. Kurtz put no numerical on any of the 2021-2022 FAR forms in the Department.
20. The scores on the 2022-2023 FAR are: Service, 4 out of 5; Instruction (Teaching), 4 out of 5; Research, Scholarship, Creative Activity, 4 out of 5: and Overall, 4 out of 5.

Respectfully submitted,

/s/ Brian J. Foley

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DATED: January 26, 2025